



Jim



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 W. 15th STREET, SUITE 3200
HELENA, MONTANA 59626

October 21, 2002

David M. Smith
BNSF-Manager Environmental Remediation
139 North Last Chance Gulch
Helena, MT 59601

Dear Mr. Smith:

The purpose of this correspondence is to transmit the final comments from EPA and the Montana Department of Environmental Quality (DEQ) on the ***Technical Impracticability Evaluation (TI) for Groundwater Restoration*** for the former Burlington Northern Santa Fe Tie Treating Plant in Somers, Montana.

The Retec Group prepared a response to earlier comments from EPA and DEQ and provided revised TI document pages. The revisions contained in the Retec response and the following comments must be incorporated into the final TI report prior to approval.

Comments:

1. The discussions contained in the executive summary and the body of the report must completely and concisely describe the waiver process, and specify the ARARs for which a waiver is requested. This discussion should also explicitly state that the remediation levels as adopted in ESDs are risk-based levels, and as such are not eligible for waiver through the TI process.
2. The area proposed for TI waiver must be depicted on a figure, included in the TI evaluation document, and must be one contiguous area rather than two separate units, consistent with the Controlled Groundwater Use Area. The rationale for selection of the boundaries, both horizontal and vertical, must be presented in the report. Please demonstrate that the monitoring locations used to determine the boundary of the area are appropriate (specifically well S-6).
3. In the Executive Summary, include zinc as a contaminant of concern.
4. Table 1-1. Add to Table 1-1 the revised risk-based remediation levels that were adopted through the 1992 and 1998 ESDs.
5. Page 3-8. Paragraph 2. Page 4-3. Paragraph 2. The system has operated for 6 years at this point, rather than 5 years.



491137

6. Page 4-4. Section 4.3. Some of the alternatives in Section 4.3 provide numbers for a 100 year time frame, and some provide numbers for a 50 year time frame. The alternatives discussed in Section 4.3 must be consistent in their use of reasonable time frame for remediation. EPA's TI Guidance states that "Very long restoration time frames (e.g., longer than 100 years) may be indicative of hydrogeologic or contaminant-related constraints to remediation." Although previous estimates of the required time for groundwater remediation reflected a 50 year period (1992 ESD), please use 100 years for evaluating the reasonableness of each of the remedial alternatives.
7. Page 5-1. Section 5.1. Paragraph 1. "The groundwater ARARs in the ROD ..." This should perhaps be remediation levels.
8. Page 5-4. Paragraph 2. "The ARARs to be waived within the TI waiver areas are shown in Table 1-1." Table 1-1 lists the remediation levels developed for the site, and the underlying ARARs are included only as a footnote to the table. Please list and cite the ARARs to be waived.
9. Page 6-1. Bullet 2. Contaminant Characteristics. "DNAPL does not exist...". Change to "DNAPL has not been encountered."
10. Page 6-2. Section 6.1. Bullet 1. ARARs can be waived, but risk-based remediation levels cannot be waived. Please modify the text appropriately.

Editorial Comments:

Page 3-11. Section 3.2.1. Wells MW-93-2S and MW-93-2D. Paragraph 2, line 1. Insert a space between "5" and "percent".

Page 4-4. Paragraph 1. Insert "is" between "and" and "summarized."

Page 4-5. Alternative 3. Paragraph 1. "Exch" must be corrected to read "Each".

Page 4-6. Paragraph 1. "Department of Natural Resources (DNR)" should be changed to read "Department of Natural Resources and Conservation (DNRC)."

Page 4-19. Section 4.3.6.3. Paragraph 1. "DNR" should be changed to "DNRC."

Page 4-19. Section 4.3.6.4. Paragraph 1. Insert "groundwater" between "controlled" and "use".

Page 5-1. Section 5.1. Paragraph 3. "...the site groundwater it is classified..." Delete "it" so the sentence reads "...the site groundwater is classified..."

Page 5-2. Paragraph 1. Revise "...from the Somers municipal system, it is not reasonable to expect that the surficial aquifer downgradient of the Somers site..." to read "...from the Somers

municipal system, it is unlikely that the surficial aquifer downgradient of the Somers site..."

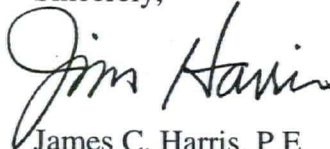
Page 6-2. Section 6.1. Bullet 2. Sentence 2. Change "prevent" to "prohibit."

Page B-7. Table B-1. What does the NOTE below Table B-1 have to do with the Table? I believe that it could be deleted.

Appendix D. Insert the correct Table and Figure numbers in the text. (Paragraph 2 – Which table does "XX" refer to? Well S-6 – Table D-1 and Figure D-1; Wells S-88-2 and S-88-3 – Table D-2 and Figure D-2; Wells S-93-2S and S-93-2D – Table D-3 and Figure D-3.)

Please review the comments presented above and contact this office with any questions that you may have. I would suggest that a revised final document be submitted to the agencies by December 1, 2002.

Sincerely,

A handwritten signature in cursive script that reads "Jim Harris".

James C. Harris, P.E.
Remedial Project Manager

Sent

cc: L. DeWitt, DEQ
C. Cosentini, Retec, Golden
L. Carlson, Retec, Billings
M. Bell, Weston